

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION**

ORDER NO. R2-2014-0008

**AMENDMENT OF SITE CLEANUP REQUIREMENTS (ORDER No. R2-2005-0038) for:
ASHLAND INC.**

for the property located at:

8610 ENTERPRISE DRIVE
NEWARK, ALAMEDA COUNTY

The California Regional Water Quality Control Board, San Francisco Bay Region (hereinafter the Regional Water Board), finds that:

1. **Regional Water Board Orders:** The Regional Water Board adopted site cleanup requirements for the real property described in Attachment 1 to this amendment (the "Original Property") on September 14, 2005 (Order No. R2-2005-0038). Order No. R2-2005-0038 names Ashland Inc. ("Ashland") as the discharger, sets cleanup standards for soil and groundwater under industrial/commercial use of the Original Property, and requires implementation of the discharger's proposed cleanup plan for remedial excavation and natural attenuation monitoring.

The Original Property was previously subject to the following orders:

- Order Nos. 74-123, 79-91, and 84-79 prescribing Waste Discharge Requirements (NPDES Permit No. CA0027693) for surface runoff discharges.
 - Order No. 89-109, Site Cleanup Requirements.
 - Order No. 98-080, Site Cleanup Requirements.
 - Order No. R2-2003-0012, Site Cleanup Requirements.
 - Order No. R2-2003-0104, Site Cleanup Requirements.
2. **Reason for Amendment:** Ashland has sold an approximately 0.33 acre portion (the "Conveyed Property") of the Original Property via a lot-line adjustment, attached hereto as "Attachment 2" and referred to herein as the "Lot Line Adjustment," to the owner of Alameda County APN No. 092-0115-010 (the "Khachaturian Property"), which borders the Original Property to the south and consists of approximately 32 acres. Ashland has retained the Original Property less the Conveyed Property (the "Retained Property"), which consists of approximately 9.97 acres. A legal description of the Conveyed Property is included as Exhibit "A-1" to the Lot-Line Adjustment (Attachment 2). A legal description of the Retained Property is included as Exhibit "A-2" to the Lot-Line Adjustment (Attachment 2). The Conveyed Property has been merged with the Khachaturian Property to form the property described as Exhibit "A-3" to the Lot Line Adjustment (Attachment 2), which is owned by William Lyon Homes, Inc. ("Lyon"), the current owner of the Khachaturian Property.

The Conveyed Property was the subject of a *Soil and Groundwater Investigation Report, 0.33-Acre Portion of the Ashland Property, 8610 Enterprise Drive, Newark, California*, dated July 11, 2013, and a *Supplemental Soil Investigation Report, 0.33-Acre Portion of Ashland Property, 8610 Enterprise Drive, Newark, California*, dated February 3, 2014, conducted and

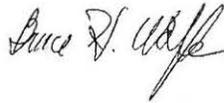
prepared by Haley & Aldrich (together, the “Investigations”). The Investigations determined that all groundwater samples collected at the Conveyed Property were below both Maximum Contaminant Levels (MCLs) (CA EPA, 2008) and Environmental Screening Levels (ESLs) (Regional Water Board, 2013) for all analyzed compounds (volatile organic compounds, semi-volatile organic compounds, and total petroleum hydrocarbons). The Investigations also determined that all soil samples collected at the Conveyed Property were below background levels and potentially-applicable ESLs for residential land use, with the exception of low levels of dioxins/furans in surficial soil.

The Conveyed Property is being removed from the cleanup requirements of Order No. R2-2005-0038 and is being transferred to the existing cleanup action for the Khachaturian Property (also known as the “Torian Holdings Property”) for the following reasons: (i) the Conveyed Property has been transferred by Ashland to Lyon, the owner of the Khachaturian Property, (ii) the Conveyed Property has been merged into the Khachaturian Property, and (iii) if developed for residential use, the Conveyed Property will be remediated with the Khachaturian Property to meet residential standards, including any actions necessary with respect to the dioxins/furans detected at the Conveyed Property. The Conveyed Property will also be removed from an existing deed restriction recorded against the Original Property because a new deed restriction will be required for the Khachaturian Property, including the Conveyed Property, if necessary to protect human health, pending the outcome of cleanup activities under Regional Water Board oversight. All cleanup requirements of Order No. R2-2005-0038 will remain in effect for the Retained Property. Ashland will continue to be responsible for investigation and cleanup activities of the Retained Property based on its status as the current property owner.

3. **California Safe Drinking Water Policy:** It is the policy of the State of California that every human being has the right to safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitary purposes. Order No. R2-2005-0038 and this amendment promote that policy by requiring discharges to be remediated such that maximum contaminant levels (designed to protect human health and ensure that the water is safe for domestic use) are met in existing and future supply wells. In particular, Order No. R2-2005-0038, as amended, provides that Site Cleanup Requirements for groundwater are based upon concentrations of chemicals of concern in the Shallow Zone and Newark Aquifer (as such capitalized terms are defined in Order No. R2-2005-0038), which will be protective of local receptor areas (waters of the San Francisco Bay) or potential drinking water resources (Newark Aquifer drinking water receptors) and will therefore result in acceptable residual risk to human health and aquatic habitats under current land use conditions, with appropriate mitigation measures to be approved by the Regional Water Board prior to any change in land use.
4. **CEQA:** This action amends an order that enforces the laws and regulations administered by the Regional Water Board. Amendment of Order No. R2-2005-0038 is not a project as defined in the California Environmental Quality Act (CEQA), and there is no possibility that the activity in question may have a significant effect on the environment. (Cal. Code Regs., tit. 14 §§ 15378 and 15061, subd. (b) (3)).
5. **Notification:** The Regional Water Board has notified the discharger and all interested agencies and persons of its intent under Water Code section 13304 to amend site cleanup requirements for the discharge and has provided them with an opportunity to submit their written comments.

IT IS HEREBY ORDERED, pursuant to section 13304 of the Water Code, that Order No. R2-2005-0038 shall be amended as follows:

The Conveyed Property, described in Exhibit "A-1" of the Lot-Line Adjustment (Attachment 2) and consisting of approximately 0.33 acres, is hereby excluded from the requirements of Order No. R2-2005-0038. The Retained Property, described at Exhibit "A-2" of the Lot-Line Adjustment (Attachment 2) and consistently of approximately 9.97 acres, remains subject to all requirements of Order No. R2-2005-0038. Ashland will continue to be responsible for investigation and cleanup activities of the Retained Property based on its status as current property owner. The Conveyed Property may also be removed by Ashland from the existing deed restriction recorded against the Original Property.



Digitally signed by Bruce H. Wolfe
DN: cn=Bruce H. Wolfe, o=SWRCB, ou=Region 2, email=bwolfe@waterboards.ca.gov, c=US
Date: 2014.03.07 14:39:27 -08'00'

Bruce H. Wolfe
Executive Officer

FAILURE TO COMPLY WITH THE REQUIREMENTS OF THIS ORDER MAY SUBJECT YOU TO ENFORCEMENT ACTION, INCLUDING BUT NOT LIMITED TO: IMPOSITION OF ADMINISTRATIVE CIVIL LIABILITY UNDER WATER CODE SECTIONS 13268 OR 13350, OR REFERRAL TO THE ATTORNEY GENERAL FOR INJUNCTIVE RELIEF OR CIVIL OR CRIMINAL LIABILITY

ATTACHMENT 1

LEGAL DESCRIPTION OF ORIGINAL PROPERTY

All of these certain tracts or parcels of land located in Newark, Alameda. County, California and being more particularly described as follows:

PARCEL ONE:

Parcel one of Parcel Map #940 as per map recorded August 22, 1972 in Book 76 Page 21 of Parcel Maps.

ATTACHMENT 2
LOT LINE ADJUSTMENT
(Attached)

JANUARY 15, 2013
JOB NO.: 1496-020

EXHIBIT "A-1"
LEGAL DESCRIPTION
PARCEL TO BE TRANSFERRED
FROM ASHLAND CHEMICAL, INC.
TO KHACHATURIAN
NEWARK, CALIFORNIA

REAL PROPERTY, SITUATE IN THE CITY OF NEWARK, COUNTY OF ALAMEDA, STATE OF CALIFORNIA, DESCRIBED AS FOLLOWS:

BEING A PORTION OF THAT CERTAIN PARCEL OF LAND GRANTED TO ASHLAND CHEMICAL, INC. BY DEED RECORDED SEPTEMBER 18, 1990, IN SERIES NUMBER 90-249087 IN THE OFFICE OF THE COUNTY RECORDER OF ALAMEDA COUNTY, ALSO BEING A PORTION OF PARCEL ONE, AS SAID PARCEL ONE IS SHOWN AND SO DESIGNATED ON PARCEL MAP 940, RECORDED AUGUST 22, 1972 IN BOOK 76 OF MAPS AT PAGE 21 IN SAID OFFICE OF THE COUNTY RECORDER OF ALAMEDA COUNTY, MORE PARTICULARLY DESCRIBED AS FOLLOWS:

BEGINNING AT THE SOUTHEASTERN CORNER OF SAID PARCEL ONE;

THENCE, FROM SAID POINT OF BEGINNING, ALONG THE SOUTHERN LINE OF SAID PARCEL ONE, SOUTH 67°47'24" WEST (THE BEARING OF SAID SOUTHERN LINE BEING TAKEN AS SOUTH 67°47'24" WEST FOR THE PURPOSE OF MAKING THIS DESCRIPTION) 289.82 FEET TO THE SOUTHWESTERN CORNER OF SAID PARCEL ONE;

THENCE, FROM SAID SOUTHWESTERN CORNER, ALONG THE WESTERN LINE OF SAID PARCEL ONE, NORTH 21°48'56" WEST 49.23 FEET;

THENCE, LEAVING SAID WESTERN LINE, NORTH 68°12'11" EAST 299.40 FEET TO A POINT ON THE EASTERN LINE OF SAID PARCEL ONE;

THENCE, ALONG SAID EASTERN LINE, SOUTH 10°19'26" EAST 48.10 FEET TO SAID POINT OF BEGINNING, AND CONTAINING 14,191 SQUARE FEET OR 0.33 ACRES OF LAND, MORE OR LESS.

END OF DESCRIPTION



Christopher S. Harmison
CHRISTOPHER S. HARMISON, P.L.S.
L.S. NO. 7176

FEBRUARY 14, 2013
JOB NO.: 1496-020

EXHIBIT "A-2"
LEGAL DESCRIPTION
RESULTANT PARCEL
ASHLAND CHEMICAL, INC. PROPERTY (APN 092-0115-005-00)
NEWARK, CALIFORNIA

REAL PROPERTY, SITUATE IN THE CITY OF NEWARK, COUNTY OF ALAMEDA, STATE OF CALIFORNIA, DESCRIBED AS FOLLOWS:

BEING ALL OF THAT CERTAIN PARCEL OF LAND GRANTED TO ASHLAND CHEMICAL, INC. BY DEED RECORDED SEPTEMBER 18, 1990, IN SERIES NUMBER 90-249087 IN THE OFFICE OF THE COUNTY RECORDER OF ALAMEDA COUNTY, ALSO BEING ALL OF PARCEL ONE, AS SAID PARCEL ONE IS SHOWN AND SO DESIGNATED ON PARCEL MAP 940, RECORDED AUGUST 22, 1972 IN BOOK 76 OF MAPS AT PAGE 21 IN SAID OFFICE OF THE COUNTY RECORDER OF ALAMEDA COUNTY, MORE PARTICULARLY DESCRIBED AS FOLLOWS;

BEGINNING AT THE SOUTHEASTERN CORNER OF SAID PARCEL ONE;

THENCE, FROM SAID POINT OF BEGINNING, ALONG THE SOUTHERN LINE OF SAID PARCEL ONE, SOUTH 67°47'24" WEST (THE BEARING OF SAID SOUTHERN LINE BEING TAKEN AS SOUTH 67°47'24" WEST FOR THE PURPOSE OF MAKING THIS DESCRIPTION) 289.82 FEET TO THE SOUTHWESTERN CORNER OF SAID PARCEL ONE;

THENCE, FROM SAID SOUTHWESTERN CORNER, ALONG THE WESTERN LINE OF SAID PARCEL ONE, THE FOLLOWING TWO (2) COURSES:

- 1) NORTH 21°48'56" WEST 771.47 FEET, AND
- 2) ALONG THE ARC OF A TANGENT 20.00 FOOT RADIUS CURVE TO THE RIGHT, THROUGH A CENTRAL ANGLE OF 90°05'41", AN ARC DISTANCE OF 31.45 FEET TO A POINT ON THE NORTHWESTERN LINE OF SAID PARCEL ONE;

THENCE, ALONG SAID NORTHWESTERN LINE, NORTH 68°16'45" EAST 734.86 FEET TO THE NORTHEASTERN CORNER OF SAID PARCEL ONE;

THENCE, FROM SAID NORTHEASTERN CORNER, ALONG THE EASTERN LINE OF SAID PARCEL ONE, THE FOLLOWING TWELVE (12) COURSES:

- 1) SOUTH 21°48'29" EAST 366.25 FEET,
- 2) SOUTH 51°13'21" WEST 22.95 FEET,
- 3) SOUTH 52°51'51" WEST 142.23 FEET,
- 4) SOUTH 49°58'25" WEST 59.44 FEET,

- 5) SOUTH 41°47'15" WEST 59.55 FEET,
- 6) SOUTH 33°21'48" WEST 49.92 FEET,
- 7) SOUTH 26°32'10" WEST 50.26 FEET,
- 8) SOUTH 18°43'05" WEST 50.10 FEET,
- 9) SOUTH 11°07'45" WEST 50.15 FEET,
- 10) SOUTH 04°00'56" WEST 50.21 FEET,
- 11) SOUTH 03°15'37" EAST 50.03 FEET, AND
- 12) SOUTH 10°19'26" EAST 100.01 FEET TO SAID POINT OF BEGINNING.

EXCEPTING THEREFROM THE FOLLOWING DESCRIBED PARCEL OF LAND:

BEGINNING AT THE SOUTHEASTERN CORNER OF SAID PARCEL ONE;

THENCE, FROM SAID POINT OF BEGINNING, ALONG THE SOUTHERN LINE OF SAID PARCEL ONE, SOUTH 67°47'24" WEST (THE BEARING OF SAID SOUTHERN LINE BEING TAKEN AS SOUTH 67°47'24" WEST FOR THE PURPOSE OF MAKING THIS DESCRIPTION) 289.82 FEET TO THE SOUTHWESTERN CORNER OF SAID PARCEL ONE;

THENCE, FROM SAID SOUTHWESTERN CORNER, ALONG THE WESTERN LINE OF SAID PARCEL ONE, NORTH 21°48'56" WEST 49.23 FEET;

THENCE, LEAVING SAID WESTERN LINE, NORTH 68°12'11" EAST 299.40 FEET TO A POINT ON THE EASTERN LINE OF SAID PARCEL ONE;

THENCE, ALONG SAID EASTERN LINE, SOUTH 10°19'26" EAST 48.10 FEET TO SAID POINT OF BEGINNING.

CONTAINING 434,255 SQUARE FEET OR 9.97 ACRES OF LAND, MORE OR LESS.

END OF DESCRIPTION



Christopher S. Harmison

CHRISTOPHER S. HARMISON, P.L.S.
L.S. NO. 7176

JANUARY 15, 2013
JOB NO.: 1496-020

EXHIBIT "A-3"
LEGAL DESCRIPTION
RESULTANT PARCEL
KHACHATURIAN PARCEL (APN 092-0115-010)
NEWARK, CALIFORNIA

REAL PROPERTY, SITUATE IN THE CITY OF NEWARK, COUNTY OF ALAMEDA, STATE OF CALIFORNIA, DESCRIBED AS FOLLOWS:

BEING ALL OF THAT CERTAIN PARCEL OF LAND DESCRIBED IN THAT CERTAIN DEED RECORDED APRIL 12, 2006, IN DOCUMENT NO. 2006-144828 OF OFFICIAL RECORDS, ALAMEDA COUNTY RECORDS, ALSO BEING A PORTION OF THAT CERTAIN PARCEL OF LAND GRANTED TO ASHLAND CHEMICAL, INC. BY DEED RECORDED SEPTEMBER 18, 1990, IN SERIES NUMBER 90-249087 IN THE OFFICE OF THE COUNTY RECORDER OF ALAMEDA COUNTY, ALSO BEING A PORTION OF PARCEL ONE, AS SAID PARCEL ONE IS SHOWN AND SO DESIGNATED ON PARCEL MAP 940, RECORDED AUGUST 22, 1972 IN BOOK 76 OF MAPS AT PAGE 21 IN SAID OFFICE OF THE COUNTY RECORDER OF ALAMEDA COUNTY;

BEGINNING AT THE WESTERN CORNER OF SAID PARCEL OF LAND (2006-144828), SAID CORNER ALSO BEING THE SOUTHERN CORNER OF SAID PARCEL ONE;

THENCE, FROM SAID POINT OF BEGINNING, ALONG SAID SOUTHWESTERN LINE OF SAID PARCEL OF LAND (2006-144828), SOUTH 21° 48' 56" EAST (THE BEARING OF SAID SOUTHWESTERN LINE BEING TAKEN AS SOUTH 21° 48' 56" EAST FOR THE PURPOSE OF MAKING THIS DESCRIPTION) 1,763.89 FEET TO THE SOUTHERN CORNER OF SAID PARCEL OF LAND (2006-144828), SAID POINT BEING A POINT ON THE NORTHWESTERN LINE OF THE LAND DESIGNATED AS PARCEL 2 IN THE DEED TO ALAMEDA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT, RECORDED OCTOBER 5, 1960, ON REEL 180, IMAGE 904, INSTRUMENT NO. AR/117706, ALAMEDA COUNTY RECORDS;

THENCE, FROM SAID SOUTHERN CORNER, ALONG THE SOUTHWESTERN LINE OF SAID PARCEL OF LAND (2006-144828), NORTH 68° 16' 36" EAST 1,000.31 FEET TO THE EASTERN CORNER OF SAID PARCEL OF LAND (2006-144828), SAID CORNER BEING THE SOUTHWESTERN LINE OF THE LAND DESIGNATED AS PARCEL 1 IN THE DEED TO ALAMEDA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT RECORDED OCTOBER 28, 1965, ON REEL 1629, IMAGE 695, INSTRUMENT NO. AX/148905, ALAMEDA COUNTY RECORDS;

THENCE, ALONG THE NORTHEASTERN LINE OF SAID PARCEL OF LAND (2006-144828), THE FOLLOWING TWO (2) COURSES:

- 1) NORTH 21° 47' 49" WEST 1,150.00 FEET, AND

- 2) NORTH 68°12' 11" EAST 60.00 FEET TO THE SOUTHWESTERN LINE OF WILLOW STREET, AS SAID WILLOW STREET IS SHOWN AND SO DESIGNATED ON THE MAP OF THE TOWN OF NEWARK, FILED MAY 6, 1878, IN BOOK 17 OF MAPS, PAGE 10, IN SAID OFFICE OF THE COUNTY RECORDER OF ALAMEDA COUNTY;

THENCE, ALONG SAID SOUTHWESTERN LINE OF WILLOW STREET, NORTH 21° 47' 49" WEST 101.99 FEET TO THE EASTERN CORNER OF PARCEL 2, AS SAID PARCEL 2 IS SHOWN AND SO DESIGNATED ON THAT CERTAIN PARCEL MAP 995, RECORDED NOVEMBER 20, 1972, IN BOOK 76 OF MAPS, AT PAGE 65, IN SAID OFFICE OF THE COUNTY RECORDER OF ALAMEDA COUNTY;

THENCE, ALONG THE SOUTHEASTERN LINE OF SAID PARCEL 2, SOUTH 68° 12' 10" WEST 775.42 FEET TO THE SOUTHERN CORNER OF SAID PARCEL 2;

THENCE, ALONG THE SOUTHWESTERN LINE OF SAID PARCEL 2, THE FOLLOWING THREE (3) COURSES:

- 1) NORTH 21° 49' 28" WEST 450.90 FEET,
- 2) NORTH 17° 44' 12" WEST 64.54 FEET, AND
- 3) NORTH 10° 19' 26" WEST 48.10 FEET TO THE WESTERN CORNER SAID PARCEL 2;

THENCE, FROM SAID WESTERN CORNER, SOUTH 68° 12' 11" WEST 299.40 FEET TO A POINT ON THE SOUTHWESTERN LINE OF SAID PARCEL ONE;

THENCE, ALONG SAID SOUTHWESTERN LINE, SOUTH 21° 48' 56" EAST 49.23 FEET TO SAID POINT OF BEGINNING.

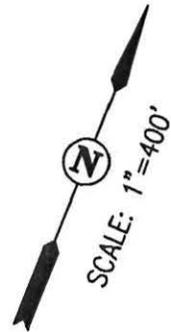
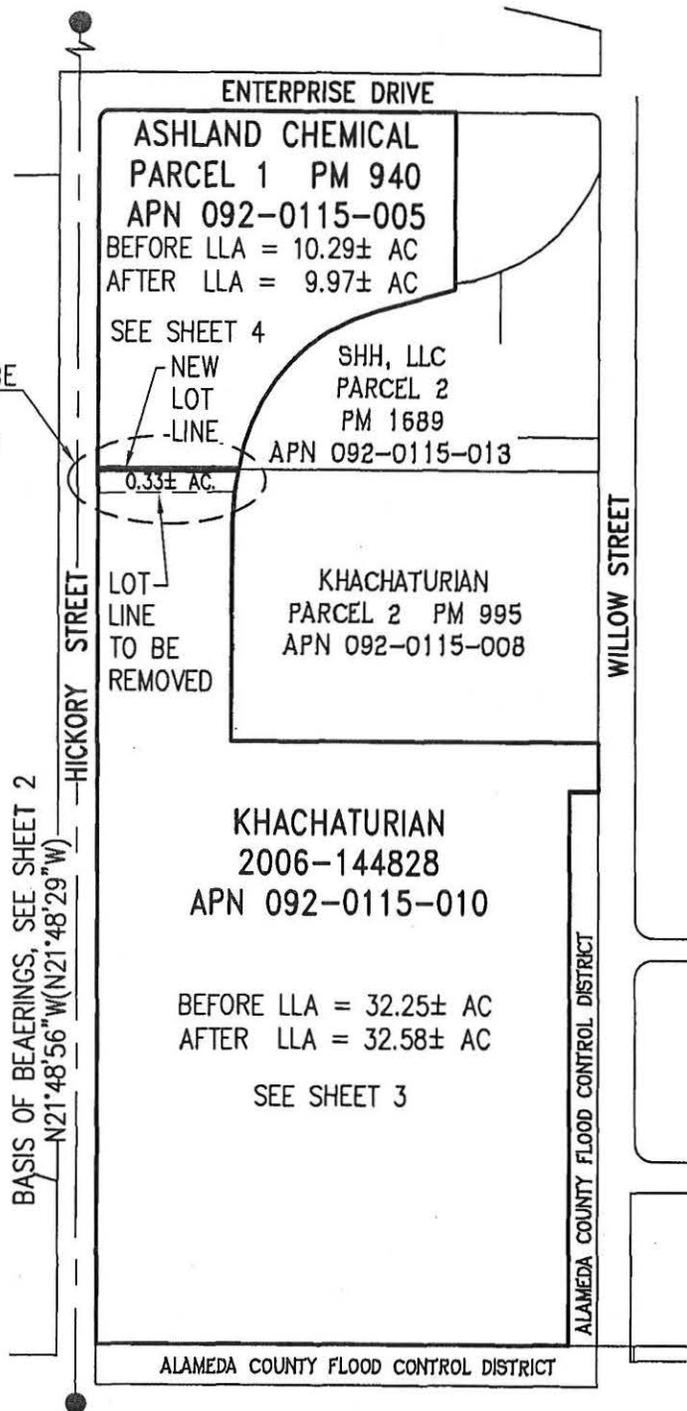
CONTAINING 1,419,127 SQUARE FEET OR 32.58 ACRES OF LAND, MORE OR LESS.

END OF DESCRIPTION



Christopher S. Harmison

CHRISTOPHER S. HARMISON, P.L.S.
L.S. NO. 7176



LEGEND

- PROPERTY LINE
- ADJACENT PROPERTY LINE
- CENTERLINE
- ADJUSTED PROPERTY LINE
- FOUND IRON PIPE
- () RECORD DATA PER PM 9837 (315 PM 84)
- [] RECORD DATA PER PM 940 (76 PM 21)



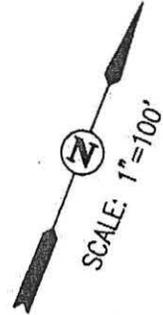
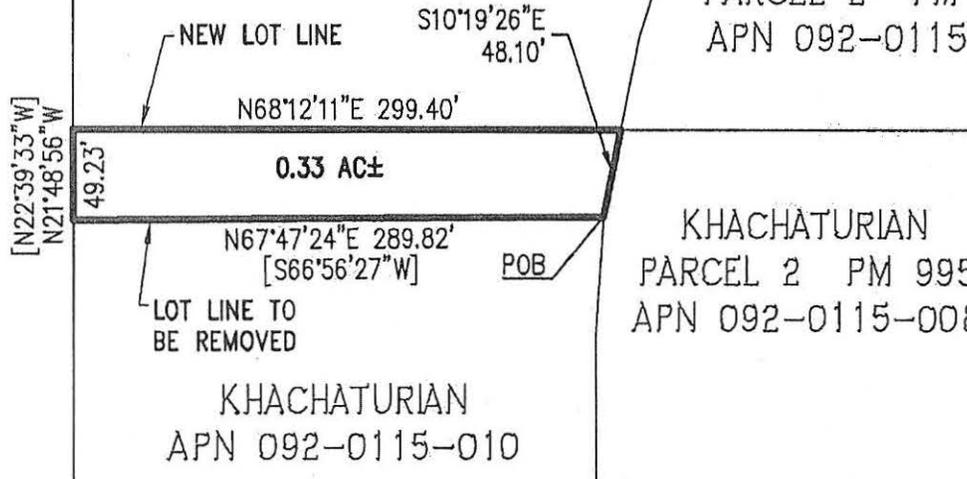
EXHIBIT "B" SHEET 1 OF 4
PLAT TO ACCOMPANY LEGAL DESCRIPTIONS
LOT LINE ADJUSTMENT
ASHLAND CHEMICAL INC. & KHACHATURIAN
NEWARK, CALIFORNIA
 JANUARY 15, 2013

Carlson, Barbee, & Gibson, Inc.

CIVIL ENGINEERS • SURVEYORS • PLANNERS
 6111 BOLLINGER CANYON ROAD, SUITE 150 SAN RAMON, CALIFORNIA 94583
 TELEPHONE: (925) 866-0322 FAX: (925) 866-8575

ASHLAND CHEMICAL, INC.
 90-249087
 PARCEL 1, PM 940
 APN 092-0115-005

SHH LLC
 PARCEL 2 PM 1689
 APN 092-0115-013



KHACHATURIAN
 PARCEL 2 PM 995
 APN 092-0115-008

KHACHATURIAN
 APN 092-0115-010

BASIS OF BEARINGS:

THE CENTERLINE OF HICKORY STREET BETWEEN TWO FOUND IRON PIPES IS TAKEN AS NORTH 21°48'56" WEST AND ROTATED 00°00'27" CLOCKWISE FROM THE BASIS OF BEARINGS AS SHOWN ON PARCEL MAP 9837 (315 PM 84). THE BEARINGS SHOWN HEREON ARE BASED ON THE CALIFORNIA COORDINATE SYSTEM ZONE 3 (NAD 83). MULTIPLY THE DISTANCES SHOWN BY 0.9999378 TO OBTAIN GRID DISTANCES.

APPROVED BY THE CITY OF NEWARK PURSUANT TO SECTION 66412(d) OF GOVERNMENT CODE.

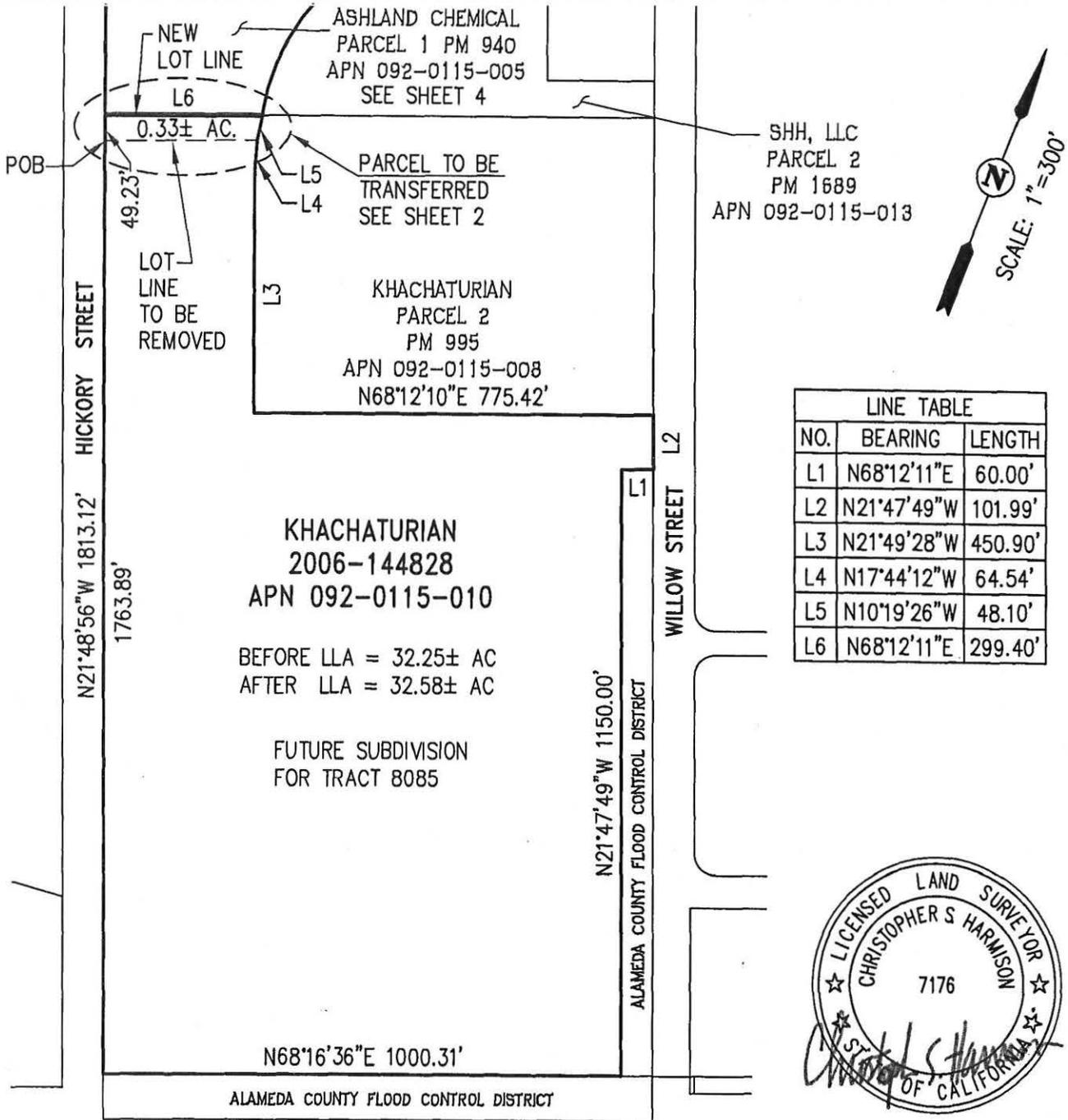
Peggy A. Claassen 1-17-13
 PEGGY A. CLAASSEN P.E. 34477 DATE
 CITY ENGINEER



EXHIBIT "B" SHEET 2 OF 4
PLAT TO ACCOMPANY LEGAL DESCRIPTION (EXHIBIT A-1)
PARCEL TO BE TRANSFERED
FROM ASHLAND CHEMICAL INC. TO KHACHATURIAN
NEWARK, CALIFORNIA
 JANUARY 15, 2013

Carlson, Barbee, & Gibson, Inc.

CIVIL ENGINEERS • SURVEYORS • PLANNERS
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LINE TABLE

NO.	BEARING	LENGTH
L1	N68°12'11"E	60.00'
L2	N21°47'49"W	101.99'
L3	N21°49'28"W	450.90'
L4	N17°44'12"W	64.54'
L5	N10°19'26"W	48.10'
L6	N68°12'11"E	299.40'



EXHIBIT "B" SHEET 3 OF 4
PLAT TO ACCOMPANY LEGAL DESCRIPTION (EXHIBIT A-3)
LOT LINE ADJUSTMENT
RESULTANT KHACHATURIAN PARCEL
NEWARK, CALIFORNIA
 JANUARY 15, 2013

Carlson, Barbee, & Gibson, Inc.

CIVIL ENGINEERS • SURVEYORS • PLANNERS
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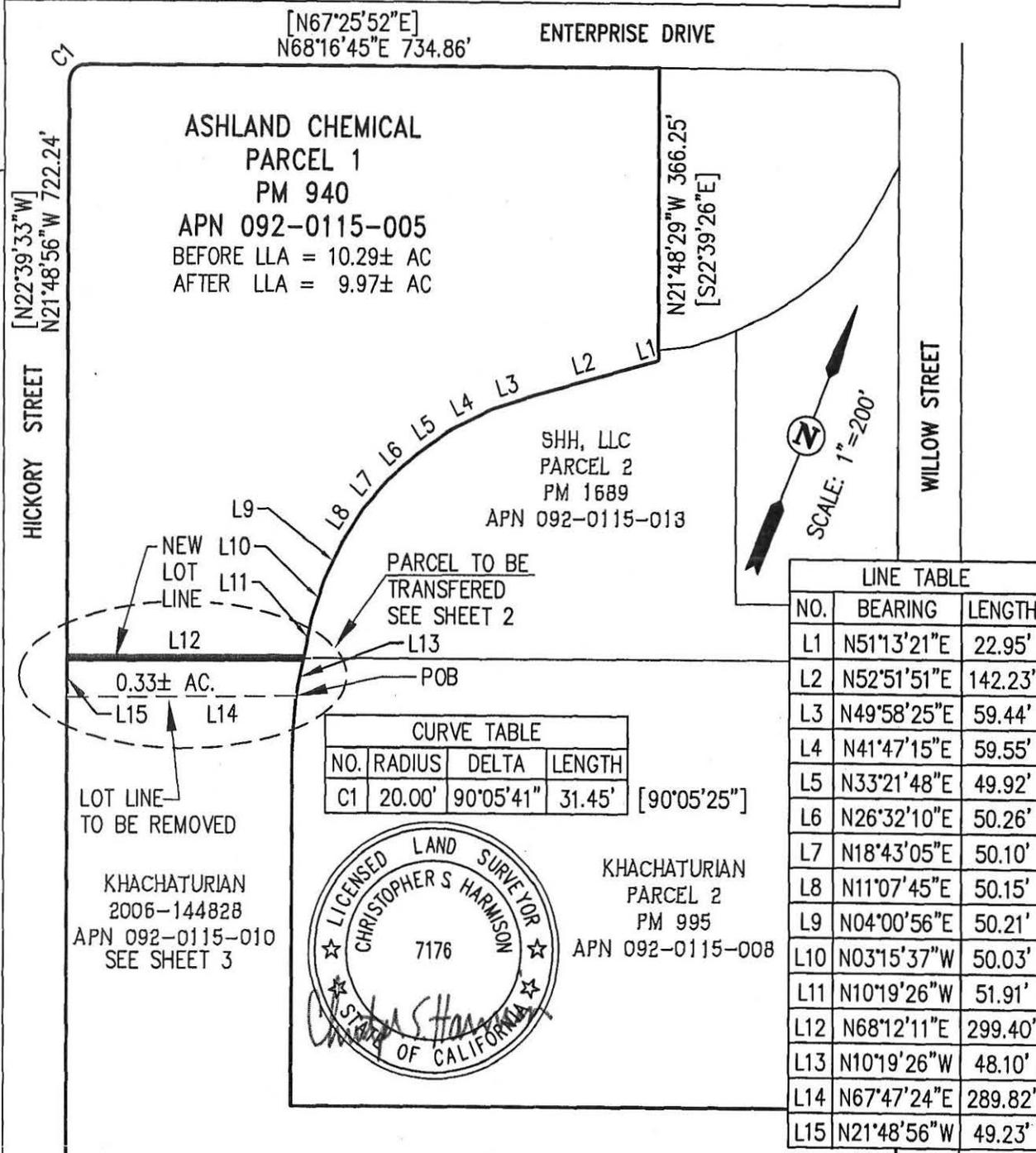


EXHIBIT "B" SHEET 4 OF 4
PLAT TO ACCOMPANY LEGAL DESCRIPTION (EXHIBIT A-2)
LOT LINE ADJUSTMENT
RESULTANT ASHLAND PARCEL
NEWARK, CALIFORNIA
 JANUARY 15, 2013

Carlson, Barbee, & Gibson, Inc.

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